EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CONSORZIO DEL PROSCIUTTO DI SAN DANIELE	:	
v.	:	C.A. No. 07-039ML
DANIELE, INC.	:	

DEFENDANT, DANIELE, INC.'S, OBJECTIONS TO PLAINTIFF'S INTERROGATORIES

Defendant objects to the preliminary instructions which precede plaintiff's interrogatories and states that the interrogatories will be responded to in accordance with Rule 26 and 33 of the Federal Rules of Civil Procedure.

INTERROGATORY NO. 5

Identify all persons who have advised Defendant on the use or registration of any trademark or other designation on prosciutto or other meat products since January 1, 2003 and, for each such person, describe the advice provided and identify all documents in which the advice is contained, descried or discussed.

ANSWER NO. 5

Defendant objects to Interrogatory No. 5 on the grounds it seeks information that is protected by the attorney-client privilege pertaining to advice given by defendant's counsel to defendant relative to the use and registration of trademarks on prosciutto and other meat products. Defendant further objects on the grounds that it is burdensome to identify each document which may contain advice of counsel. Without waiving said objection, defendant will identify the attorneys who assisted the defendant and provided legal advice relative to the adoption and registration of trademarks for its line of prosciutto. The attorneys were I. Stephen Samuels, Esq., Samuels & Hiebert, LLC, Two International Place, 23rd Floor, Boston, MA 02110, Michael J. Bevilacqua, Esq., Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, MA 02109 and Girard R. Visconti, Esq., 55 Dorrance Street, Providence, Rhode Island 02903.

INTERROGATORY NO. 6

Identify all facts and documents that you contend show that any of the following is a trademark or would be recognized by purchasers as a trademark: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

ANSWER NO. 6

Defendant objects to providing plaintiff with its legal research and case law as this is protected by the work product doctrine. Without waiving said objection, see the applications submitted to the United States Trademark Office which has already been provided as an exhibit to the dispositive motion that was filed. The United States Trademark Office has not rejected any of the applications as being applications for names that do not function as trademarks. For a complete status of the trademark applications, see the website: http://tarr.uspto.gov/. The application numbers are as follows:

DELI-CUT-O, 77163430

GRAN PREMIO, 77163396

PRESIDENT'S, 77163346

PRESIDENT'S RESERVE 400, 77163366

RISERVA, 77163450

INTERROGATORY NO. 7

Identify all facts and documents that you contend support your interpretation of paragraph 5 of the Settlement Agreement of March 2005.

ANSWER NO. 7

Defendant objects to providing facts obtained from defendant's counsel as the information was exchanged between counsel with no third parties present and was sought for the purpose of seeking legal advice, and as such the information is subject to the attorney-client privilege. Defendant further objects to providing information obtained from legal research as the information is work product. Without waiving said objection, the five names chosen are suggestive and not descriptive and are valid trademarks subject only to prior use of the terms by other parties if such terms cause a likelihood of confusion. To date, the Trademark Office has determined that all the five names qualify as trademarks. The names were not rejected by the United States Trademark Office as being generic or merely descriptive. The factual determinations made by the trademark examiner are entitled to deference. The current status of the trademark applications to date can be found on the website identified in answer to interrogatory number 6.

INTERROGATORY NO. 8

Identify all documents concerning the use or proposed use of any of the following as designations for prosciutto produced by Defendant, whether or not as trademarks: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

ANSWER NO. 8

Defendant objects to Interrogatory No. 8 to the extent it encompasses letters exchanged to and from defendant's counsel to defendant relative to the five trademarks and legal advice given relative to the five trademarks. Defendant also objects to providing confidential, proprietary and trade secret information. Without waiving said objection, non-privileged documents would be the 2004 brochure of which plaintiff already has a copy and the website which can be accessed at www.danielefoods.com. Representative samples of the labels have already been provided to plaintiff.

INTERROGATORY NO. 10

For each of the following designations, in connection with the production of prosciutto, describe Defendant's production process and the minimum time the product is aged: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

ANSWER NO. 10

Defendant objects to Interrogatory No. 10 on the grounds that it seeks confidential, privileged information relative to Daniele's trade secrets and proprietary business means, method, scope and process of its production of prosciutto which is proprietary and confidential and is not subject to disclosure to a potential competitor.

INTERROGATORY NO. 11

Provide the quantity of prosciutto products sold by Defendant, by year since January 1, 2000 under each of the following designations, broken out by product sold in bulk and product sold in packages of pre-sliced prosciutto: DANIELE, GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

ANSWER NO. 11

Defendant objects to Interrogatory No. 11 on the grounds that it seeks information that is irrelevant, overly broad and burdensome. The Settlement Agreement was entered into in March of 2005. Plaintiff is seeking information from January of 2000 to the present. Without waiving said objection, and if directed to do so by the court, defendant will identify from March, 2005 to the present, prosciutto, sold under the product lines identified:

DANIELE, GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

INTERROGATORY NO. 13

Provide total expenditures, by year from 2000 to the present, which Defendant claims it has made or which Defendant claims have been made on its behalf to promote each of the following trademarks: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

ANSWER NO. 13

Defendant objects to Interrogatory No. 13 on the grounds that total expenditures is overly broad, burdensome, irrelevant and seeks information that is proprietary, confidential and constitutes a trade secret relative to Daniele's business operations, practices, expenses, labor, equipment and material costs relative to selling its line of prosciutto and such information is privileged and not subject to disclosure. Further, seeking expenses since 2000 is irrelevant since the Settlement Agreement was entered into on March 25, 2005.

INTERROGATORY NO. 17

Identify all persons who have given you, your attorney or any person, firm or corporation acting in your behalf, statements, voice recordings, reports or memoranda in any way concerning the claims and defenses alleged in the Complaint and Answer, the date of each such statement, voice recordings, reports or memoranda and identify the person who now has possession of same.

ANSWER NO. 17

No written statements from any third party other than e-mails and letters exchanged by and between Daniele and its counsel and e-mails and letters exchanged by and between counsel to counsel which is privileged under the attorney-client privilege and work product privilege. No statements have been obtained from third parties.

INTERROGATORY NO. 20

Identify all persons who have been responsible for Defendant's compliance with the Settlement Agreement of March 2005 between Plaintiff and Defendant, and describe the responsibilities of each in this regard.

ANSWER NO. 20

Defendant objects to Interrogatory No. 20 to the extent it seeks any information exchanged between Daniele and its attorneys relative to interpretation of the Settlement

Agreement, counsel's opinions and position as to the duties and responsibilities of the parties under the Settlement Agreement as such information is privileged and protected by the attorney-client privilege. The individuals from Daniele, Inc. who were responsible for compliance with the Settlement Agreement dated March 25, 2005 are: Vlado Dukcevich, Vice President, Stefano Dukcevich, President, Joe Markey, Purchasing Manager, and Elliott Krug, Controller (no longer employed at company).

Defendant,
Daniele, Inc.
By its Attorneys,

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CERTIFICATION

The undersigned hereby certifies that a true copy of the within document was forwarded on this 9th day of January, 2008, via first class mail, postage pre-paid, to the following counsel of record:

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